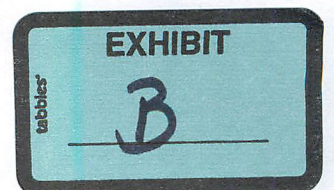


MATERIALS



Job Name: CML106 DCKOHLER
Page: 1

*** CASE LEDGER ***

Date Run: 1/23/17
Time Run: 13:33:14

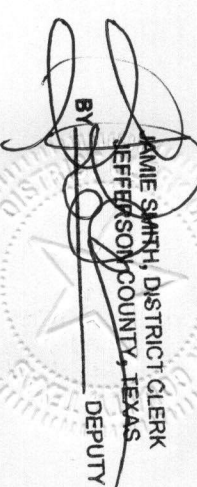
Case Number: E-0199330- Filed: 12/03/16 Case Type: PERSONAL INJURY INVOLVING MOTOR VEHICLE Status: PENDING

Plaintiff: DONNA KELAMS
VS Defendant: ROMEO TRUCKING LLC ET AL
Plaintiff Attorney: LILES, WILLIAM R
Defendant Attorney: NO ATTORNEY AT THIS TIME

Date	Cause No.	Name	Debit Description	Credit Amount/ Debit Amount	Receipt No/ Balance
12/03/16	E-0199330-	LILES, WILLIAM R			
		PETITION (PLAINTIFF'S ORIGINAL)		.00	
		APPLICATION (JURY TRIAL/JURY DEMAND)		.00	
		CIVIL PROCESS FORM		.00	
		CASE INFORMATION SHEET		.00	
12/05/16	E-0199330-	LILES, WILLIAM R			
		CITATION	DISTRICT CLERK SERVICE CHARGE	16.00-	
		CITATION	MAILING SERVICE	2.66-	
		CITATION	DISTRICT CLERK SERVICE CHARGE	16.00-	
			RECORDS MANAGEMENT	372.66+ B 0365652	
			RECORDS ARCHIVE FEE	10.00-	
			COUNTY FILING FEE	10.00-	
			STATE FILING FEE	50.00-	
			LIBRARY FEE	10.00-	
			MEDIATION CENTER FEE	15.00-	
			STENO	15.00-	
			SECURITY FEE	5.00-	
			INDIGENT FEE	10.00-	
			JUDICIAL SUPPORT	42.00-	
			APPELLATE JUDICIAL SYSTEM	5.00-	
			ELECTRONIC FILING FEE	30.00-	
			COURT RECORD PRESERVATION	10.00-	
			JURY	40.00-	
			COPIES	36.00-	
				.00+	
12/29/16	E-0199330-	LILES, WILLIAM R			
		CITATION (RETURN)		.00	
		CITATION (RETURN)		.00	
1/06/17	E-0199330-	LILES, WILLIAM R			
		CITATION	OUTSIDE SERVICE	.00 OC	
		CITATION	OUTSIDE SERVICE	.00 OC	
				.00+	

I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

JAN 23 2017

BY  JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS
DEPUTY

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
12/3/2016 8:40:51 AM
JAMIE SMITH
DISTRICT CLERK
E-199330

CAUSE NO. _____

DONNA KELLAMS,

Plaintiff,

VS.

ROMEO TRUCKING LLC and
ERIC BORDELON,

Defendants.

§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

JEFFERSON COUNTY, TEXAS

_____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

COMES NOW, Donna Kellams, Plaintiff, in the above-styled and numbered cause of action, complaining of Defendants Romeo Trucking LLC and Eric Bordelon, and in support thereof, Plaintiff shows the Court as follows:

I. DISCOVERY CONTROL PLAN

1.1 Pursuant to Texas Rule of Civil Procedure 190.3, Plaintiff intends to conduct discovery in this case under a Level 3 Discovery Control Plan.

II. PARTIES

2.1 Plaintiff Donna Kellams ("Plaintiff") is a resident citizen of Beaumont, Jefferson County, Texas.

2.2 Defendant Romeo Trucking LLC (hereinafter referred to as "Defendant Romeo") is a foreign limited liability company authorized to do business in the State of Texas. This action arises out of a wreck involving a truck driver who was driving on behalf of Defendant Romeo, a motor carrier with its principal office in Louisiana; therefore, service upon Defendant Romeo may be made pursuant to Texas Civil Practice and Remedies Code §§ 17.061 - 17.069. Process should be served on Defendant Romeo by serving Tryon D. Lewis, Chairman of the Texas

Transportation Commission, at P.O. Box 111th St., Austin, Texas, 78701-2483, to be forwarded to



~~CERTIFY THIS IS A TRUE COPY~~
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

the last known address for Defendant Romeo at 1516 Clover Drive, Lake Charles, Louisiana 70607.

2.3 Defendant Eric Bordelon (“Defendant Bordelon”) is a person who is nonresident of Texas. Pursuant to Texas Civil Practices and Remedies Code 17.061, the Chair of the Texas Transportation Commission is the agent for service of process on a person who is a nonresident of Texas in any suit against a person involved in an accident that occurred while operating a motor vehicle on a public highway or street in this state. Defendant may be served with process, in person, or mailing by registered or certified mail, return receipt requested, a true copy of the citation and petition to: Tyron D. Lewis, Chairman, Texas Transportation Commission, 125 E. 11th Street, Austin, TX 78701-2483, who shall forward documents to Eric Bordelon at 3901 Harvard Street, Lake Charles, Louisiana 70607.

III. JURISDICTION & VENUE

3.1 The Court has jurisdiction in this cause since the damages to Plaintiff are within the jurisdictional limits of the Court.

3.2 Pursuant to sections 15.001 and 15.002(a)(1) of the Texas Civil Practice and Remedies Code, this venue is proper because all, or a substantial part, of the events or omissions giving rise to the claim occurred in Jefferson County, Texas. The venue is also proper because it best serves the convenience of the parties and witnesses, as well as the interests of justice.

3.3 Plaintiff has satisfied all conditions precedent to bringing this lawsuit.

3.4 Nothing Plaintiff did caused or contributed to this occurrence.

3.5 Plaintiff seeks monetary relief over \$200,000, but not more than \$1,000,000.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 2 of 8

IV. FACTS

4.1 On or about July 24, 2015, Plaintiff was traveling southbound in the 900 block of Interstate 10 S Service Road entering the intersection in the 3900 block of College Street on a green light. Defendant Bordelon was traveling eastbound in the 3900 block of College Street entering the intersection of the 900 block of Interstate 10 S Service Road and College Street when he disregarded the stop and go signal, ran the red light and collided with Plaintiff. Defendant Bordelon received a citation for disregarding a red light. Defendant Bordelon was operating a tractor in the course and scope of his employment with Defendant Romeo under its operating authority and under its DOT #2520263. The collision proximately caused Plaintiff to suffer severe and painful personal injuries.

V. NEGLIGENCE OF ROMEO TRUCKING LLC

5.1 At all times material to this lawsuit, Defendant Bordelon was an employee of Defendant Romeo and was acting within the course and scope of his employment with Defendant Romeo. Consequently, Defendant Romeo is vicariously liable to Plaintiff for the negligent conduct of Defendant Bordelon, under the theory of *respondeat superior*.

5.2 Further, the independent conduct of Defendant Romeo constitutes negligence as that term is known in law. Such negligent acts or omissions include, but are not limited to the following:

- a. allowing Defendant Bordelon to operate its vehicle even though it knew or should have known he was a reckless or incompetent driver;
- b. entrusting a vehicle to Defendant Bordelon even though it knew or should have known he was a reckless or incompetent driver;
- c. failing to properly train Defendant Bordelon in the safe operation of a motor vehicle;



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 3 of 8

- d. retaining Defendant Bordelon after it knew or should have known that he was a reckless or incompetent driver;
- e. failing to properly maintain the vehicle in a safe operational condition;
- f. failing to maintain the vehicle to the minimal standard of safety;
- g. failing to establish and enforce safety rules and regulations;
- h. failing to properly educate, instruct, and supervise the performance of Defendant Bordelon's duties;
- i. failing to provide proper safety manuals and instructions to employees responsible for safety;
- j. failing to enforce and ensure compliance of established safety and operational rules and regulations for persons operating its equipment;
- k. failing to comply with the Federal Motor Carrier Safety Administration's Rules and Regulations, and/or
- l. other acts of negligence and negligence per se.

One, some, or all of the foregoing acts and/or omissions or others on the part of Defendant Romeo constituted negligence and such negligence was a proximate cause of the occurrence of Plaintiff's injuries and damages.

5.3 Plaintiff would show this Court that the harm Plaintiff suffered is the type of harm which the above-referenced statutes are intended to prevent. Plaintiff would also show this Court that Plaintiff was a member of the class of persons in which the above-referenced statutes was enacted to protect. Such violations amount to *negligence per se* and is the proximate cause of the occurrence in question.

VI. NEGLIGENCE OF DEFENDANT BORDELON

6.1 The collision made the basis of this lawsuit resulted from the improper conduct of Defendant Bordelon. The conduct of Defendant Bordelon constituted negligence as that term is understood under Texas law and such negligent conduct was a proximate cause of the occurrence, injuries



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 4 of 8

and damages to Plaintiff. Defendant Bordelon's negligent actions or omissions include, but are not limited to, one or more of the following non-exclusive particulars:

- a. failing to timely apply the brakes;
- b. failing to maintain a proper lookout;
- c. failing to obey a traffic control device;
- d. failing to maintain proper control of defendant's vehicle;
- e. failing to turn the vehicle to avoid the collision;
- f. failing to avoid the incident in question;
- g. driving defendant Bordelon's vehicle at a rate of speed greater than that at which an ordinarily prudent person would have driven under the same or similar circumstances;
- h. failing to operate his vehicle in a safe manner; and
- i. failing to operate his vehicle as a person of ordinary prudence would have in the same or similar circumstance.

The foregoing acts and/or omissions on the part of this Defendant constituted negligence and such negligence was a proximate cause of the occurrence of Plaintiff's injuries and damages.

VII. DAMAGES

7.1 As a result of the incident made the basis of this lawsuit described in the preceding paragraphs and the negligence of Defendants, Plaintiff sustained significant injuries and damages in the past and will, in reasonable probability, sustain these damages in the future.

7.2 Plaintiff respectfully requests that the trier of fact determine the amount of his damages and losses that he has incurred in the past and will reasonably incur in the future, as well as the monetary value of these damages, which include, but are not limited to:

- a. past and future physical pain and suffering and mental anguish;



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 5 of 8

- c. past and future physical impairment;
- d. past and future medical care expenses;
- e. past and future loss of earnings and earning capacity, and
- f. past and future out-of-pocket economic losses.

7.3 Because of all of the above and foregoing, Plaintiff has suffered actual damages in excess of the minimum jurisdictional limits of the Court for which damages Plaintiff now brings suit.

7.4 Plaintiff seeks both prejudgment and post judgment interest as allowed by law, for all costs of court, and all other relief, both in law and in equity, to which he may be entitled.

VIII. PRESERVATION OF EVIDENCE

8.1 Plaintiff hereby requests and demands that each Defendant preserve and maintain all evidence pertaining to any claim or defense related to the incident made the basis of this lawsuit, or the damages resulting therefrom, including photographs, videotapes, audiotapes, recordings, business or medical records; bills; estimates; invoices; checks; measurements; correspondence; memoranda; files; any item which has been removed from the premises which was involved in the incident; facsimile; email; voicemail; text messages; investigation; cellular telephone records; calendar entries; and any electronic image, data, or information related to Donna Kellams, the referenced incident, or any damages resulting therefrom. Failure to maintain such items will constitute a spoliation of the evidence.

IX. JURY DEMAND

9.1 Pursuant to Rule 216 of the Texas Rules of Civil Procedure, Plaintiff respectfully requests and demands a trial by jury.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 6 of 8

X. REQUEST FOR DISCLOSURE

10.1 Pursuant to Rule 194, request is made that each Defendant disclose, within fifty (50) days of service of this Request, the information or material described in Texas Rule of Civil Procedure 194.2(a)–(l). Each Defendant must serve a written response to these Requests for Disclosure on Plaintiff within fifty (50) days after the service of this request. Failure to timely respond shall constitute an abuse of discovery pursuant to Texas Rule of Civil Procedure 215.

XI. RULE 193.7 NOTICE

11.1 Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Plaintiff hereby gives actual notice to each Defendant that any and all documents produced may be used against the Defendant producing the document at any pretrial proceeding and/or at the trial of this matter without the necessity of authenticating the documents.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff Donna Kellams prays that Defendants Romero Trucking LLC and Eric Bordelon be cited in terms of law to appear and answer herein, and that upon final trial and hearing hereof, Plaintiff recover damages in accordance with the evidence, costs of Court herein expended, interest allowed under the law, and that Plaintiff be granted such other and further relief, both general and special, at law and in equity, to which Plaintiff may be justly entitled.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 7 of 8

Respectfully submitted,

JIM S. ADLER & ASSOCIATES

/s/ William R. Liles

WILLIAM R. LILES

State Bar No. 24083395

wliles@jimadler.com

Bank of America

12605 East Freeway, Suite 400

Houston, Texas 77015

Telephone: (713) 451-0001

Facsimile: (713) 335-1100

ATTORNEYS FOR PLAINTIFF



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 8 of 8

CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY): COURT (FOR CLERK USE ONLY):

STYLED DONNA KELLAMS VS. ROMEO TRUCKING LLC AND ERIC BORDELON
(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
12/3/2016 8:40:51 AM
JAMIE SMITH
DISTRICT CLERK
E-199330

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:			Names of parties in case:		Person or entity completing sheet is:	
Name: William R. Liles Email: wliles@jimadler.com Address: 12605 East Freeway Suit 400 City/State/Zip: Houston, TX 77015 Signature: /s/ William R. Liles			Plaintiff(s)/Petitioner(s): Donna Kellams Defendant(s)/Respondent(s): Romeo Trucking LLC and Eric Bordelon		<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ Additional Parties in Child Support Case: Custodial Parent: Non-Custodial Parent: Presumed Father:	
[Attach additional page as necessary to list all parties]						
2. Indicate case type, or identify the most important issue in the case (select only 1):						
Civil			Family Law			
Contract		Injury or Damage	Real Property	Marriage Relationship	Post-judgment Actions (non-Title IV-D)	
<input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: <input type="checkbox"/> Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:		<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <input type="checkbox"/> Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <input type="checkbox"/> Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input type="checkbox"/> Other Injury or Damage:	<input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <i>Divorce</i> <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Paternity/Parentage <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child:	
Employment		Other Civil				
<input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment:		<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____				
Tax		Probate & Mental Health				
<input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax		<input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____				
3. Indicate procedure or remedy, if applicable (may select more than 1):						
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover		
4. Indicate damages sought (do not select if a family law case):						



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office
January 23, 2017
JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

- ☐ Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees
- ☐ Less than \$100,000 and non-monetary relief
- ☐ Over \$100, 000 but not more than \$200,000
- ☒ Over \$200,000 but not more than \$1,000,000
- ☐ Over \$1,000,000

Rev 2/13



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith



JAMIE SMITH
JEFFERSON COUNTY DISTRICT CLERK
1085 PEARL STREET, ROOM 203, BEAUMONT, TX 77701

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
12/3/2016 8:40:51 AM
JAMIE SMITH
DISTRICT CLERK
E-199330

REQUEST FOR PROCESS

All sections must be completed for processing this request.

Section 1:

Cause No. _____

Date December 2, 2016

Style:

Donna Kellams

VS

Romeo Trucking LLC and Eric Bordelon

Section 2:

Check Process Type:

☒ Citation ☐ Precept to Serve / Notice of Hearing/Notice to Show Cause

☐ Temporary Restraining Order

☐ Application for Protective Order / Temporary (Ex Parte) Protective Order

☐ Notice of Registration of Foreign Judgment ☐ Citation by Posting

☐ Writ of _____ ☐ Other _____

☐ Citation by Publication* - Newspaper: _____

☐ Check box if you would like the District Clerk's Office to make copies for your service. (\$1.00 per page per pleading for copies for service)

Section 3:

Title of Document/Pleading to be attached for service: Plaintiff's Original Petition

Note: You must furnish one copy of the document/pleading for each party served.

Section 4: PARTIES TO BE SERVED (Please type or print):

1. Name: Romeo Trucking LLC by and through Tryon D. Lewis, chairman of the Texas
Address: Transportation Commission, 125 E. 11st Street, Austin, Texas 78701 and then to
be forwarded to Romeo Trucking LLC at 1516 Clover Drive, Lake Charles,
City: Louisiana 70607 State: _____ Zip: _____

2. Name: Eric Bordelon by and through Tryon D. Lewis, chairman of the Texas
Address: Transportation Commission, 125 E. 11st Street, Austin, Texas 78701 and then to
be forwarded to Romeo Trucking LLC at 3901 Harvard Street, Lake Charles,
City: Louisiana 70607 State: _____ Zip: _____



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 1 of 2

3. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

4. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

5. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Section 5

Check Service Type:

- | | |
|---|--|
| <input type="checkbox"/> No Service | <input type="checkbox"/> Secretary of State |
| <input type="checkbox"/> Sheriff | <input type="checkbox"/> Commissioner of Insurance |
| <input type="checkbox"/> Constable Pct. | <input type="checkbox"/> Out of County |
| <input type="checkbox"/> Out of State | <input checked="" type="checkbox"/> Private Process <input type="checkbox"/> Other |
| <input type="checkbox"/> Certified Mail | |

Section 6 (ONLY if Section 7 does not apply)

Attorney Name: William R. Liles

Address: 12605 East Freeway, Suite 400

_____	Street/P.O. Box	_____
Houston	Texas	77015
City	State	Zip

Attorney's Telephone No. 713.335.1022 Attorney's Bar No. 24083395

Section 7 (ONLY if Section 6 does not apply)

Pro-Se Name: _____

Address: _____

_____ City _____ State _____ Zip _____

Telephone No. _____

Section 8

Check Delivery Type:

- ☒ Hold for pick up ☐ Mail to Attorney

Process Service from Republic Service will pick up the citations when ready. Please call Julie at 713.335.1026. Thank you!



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office
January 23, 2017
JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 2 of 2

**Jefferson County
District Clerk's Office**
1085 Pearl Street
Room 203
Beaumont, TX 77701
409-835-8580
Fax 409-835-8527



Family Law Division
409-835-8653

Child Support
P. O. Box 3586
Beaumont, TX 77704
409-835-8425

**JAMIE SMITH
District Clerk**

April 23, 2015

In 2015 the Jefferson County District Clerks office filed a Declaration of Compliance with the Texas State Library and Archives Commission.

As records management officer for the local government or elective county office named, I hereby declare, that in lieu of filing records control schedules, we have adopted records control schedules that comply with minimum requirements established on records retention schedules issued by the Texas State Library and Archives Commission for use in our records management program. In doing so, I also certify that the administrative rules for electronic records, adopted by the commission under Local Government Code 205.003(a) will be followed for records subject to the rules.

A copy of the accepted Declaration of compliance is attached.

Jamie Smith



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 1 of 2

Original



Declaration of Compliance

with the Records Scheduling Requirement of the Local Government Records Act
Submitted pursuant to Local Government Code §203.041(a)(2)

Section 1 SUBMISSION OF DATA

1. Government: Jefferson County
2. Address: 1085 Pearl Street Rm #203
City: Beaumont ZIP code: 77701
3. Telephone: 409-835-8518 4. Email (optional): jsmith@co.jefferson.tx.us

Section 2 LOCAL GOVERNMENT CERTIFICATION

As records management officer for the local government or elective county office named, I hereby declare, that in lieu of filing records control schedules, we have adopted records control schedules that comply with minimum requirements established on records retention schedules issued by the Texas State Library and Archives Commission (as checked below) for use in our records management program. In doing so, I also certify that the administrative rules for electronic records, adopted by the commission under Local Government Code §205.003(a) will be followed for records subject to the rules. I understand that:

- the validity of this declaration is contingent on its acceptance for filing by the commission;
- if we have previously filed documentation with the commission in which we declared our intent to retain all records permanently, we must attach amended documentation to this declaration before it can be accepted for filing;
- the records retention schedules adopted by this declaration may be amended by filing for approval a supplemental Records Control Schedule Amendment (SLR 520) on which are listed proposed retention periods for records that do not appear on schedules issued by the commission (as checked below);
- if a supplemental Records Control Schedule Amendment is not filed, we must file a Request for Authorization to Destroy Unscheduled Records (SLR 501) in order to destroy records that do not appear on schedules issued by the commission (as checked below); and
- the commission will provide us with access to subsequent editions of any schedules issued by the commission.

1. I hereby declare that our records control schedules will comply with the following schedules issued by the commission:

- | | |
|---|--|
| <input type="checkbox"/> Schedule CC (Records of County Clerks) | <input type="checkbox"/> Schedule LC (Records of Justice and Municipal Courts) |
| <input checked="" type="checkbox"/> Schedule DC (Records of District Clerks) | <input type="checkbox"/> Schedule PS (Records of Public Safety Agencies) |
| <input type="checkbox"/> Schedule EL (Records of Elections and Voter Registration) | <input type="checkbox"/> Schedule PW (Records of Public Works and Services) |
| <input checked="" type="checkbox"/> Schedule GR (Records Common to All Governments) | <input type="checkbox"/> Schedule SD (Records of Public School Districts) |
| <input type="checkbox"/> Schedule HR (Records of Public Health Agencies) | <input type="checkbox"/> Schedule TX (Records of Property Taxation) |
| <input type="checkbox"/> Schedule JC (Records of Public Junior Colleges) | <input type="checkbox"/> Schedule UT (Records of Utility Services) |

2. If any records control schedules or amendments have been filed with the commission, I also hereby declare that those schedules or amendments:

- ☒ are superseded by this declaration.
- ☐ are not superseded by this declaration. I understand that, in the event of a conflict between the previously filed records control schedules or amendments and the schedules adopted by this declaration, the longer retention period shall apply.

Name and Title: Jamie Smith Jefferson County District Clerk

Signature: Jamie Smith Date: 1/27/2015

Section 3 TEXAS STATE LIBRARY ACCEPTANCE (to be completed by Texas State Library)

This Declaration of Compliance has been accepted for filing pursuant to Local Government Code §203.043(a). A record appearing on a schedule issued by the commission (as checked above) may be disposed of at the expiration of its retention period without additional notice to the Director and Librarian, subject to the provisions of Local Government Code §203.041(d).

Name and Title: SARAH JACOBSON - MANAGER, RECORDS MGMT. ASSISTANCE

Signature: [Signature] Date: 02/23/15

Texas State Library and Archives Commission
State and Local Records Management Division

Box 12927
Austin, Texas 78711-2927

512-463-7610
512-936-2306 FAX

SLR 508 (5/12)



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 2 of 2

123 05 000 MS

Cause No: E-0199330 Date: 12/05/16 Receipt No: 365652
Style: DONNA KELLAMS
vs ROMEO TRUCKING LLC ET AL

Paid By: LYLES, WILLIAM P
Amt Paid: 372.66 EFILE014097612-1 Bal Due:

10.00	RECORDS MANAGEMENT	10.00	COURT RECORD PRESERVATIO
10.00	RECORDS ARCHIVE FEE	40.00	JURY
50.00	COUNTY FILING FEE	36.00	COPIES
50.00	STATE FILING FEE		
10.00	LIBRARY FEE		
15.00	MEDIATION CENTER FEE		
15.00	STENO		
5.00	SECURITY FEE		
10.00	INDIGENT FEE		
42.00	JUDICIAL SUPPORT		
5.00	APPELLATE JUDICIAL SYSTE		
30.00	ELECTRONIC FILING FEE		

JAMIE SMITH, CLERK DISTRICT COURTS
Jefferson County, Texas

By: _____
ODBC Deputy



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 1 of 1



C0199330---00012

CITATION

THE STATE OF TEXAS**No. E-0199330****DONNA KELLAMS
VS. ROMEO TRUCKING LLC ET AL****CITATION****172nd JUDICIAL DISTRICT COURT
of JEFFERSON COUNTY, TEXAS****To: BORDELON, ERIC
BY SERVING TRYON D LEWIS, TEXAS TRANSPORTATION COMMISSION
FORWARD TO ERIC BORDERLON, ROMEO TRUCKING LLC****by serving at:
3901 HARVARD STREET****LAKE CHARLES, LA 70607****DEFENDANT:****NOTICE:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Said answer may be filed by mailing same to: District Clerk's Office, 1085 Pearl, Room 203, Beaumont, TX 77701, (or if the case is designated as an E-file case, E-file through Lexis Nexis file and serve) or by bringing it to the office. The case is presently pending before the 172nd District Court of Jefferson County sitting in Beaumont, Texas, and was filed on the 3rd day of December, 2016. It bears cause number E-0199330 and is styled:

Plaintiff:

**DONNA KELLAMS
VS.
ROMEO TRUCKING LLC ET AL**

Defendant:

The name and address of the attorney for plaintiff (or plaintiff if pro se) is:

**LILES, WILLIAM R, Atty.
BANK OF AMERICA 12605 EAST FREEWAY, STE 400
HOUSTON, TX 77015 0**

The nature of the demands of said plaintiff is shown by a true and correct copy of Plaintiff's PETITION (PLAINTIFF'S ORIGINAL) AND LETTER DESIGNATING ALL CASES BE EFILED accompanying this citation and made a part thereof.

Issued under my hand and the seal of said court, at Beaumont, Texas, this the 5th day of December, 2016.

**JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS**

BY

Deputy

Stacie

**I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office**

January 23, 2017

**JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS**

Page 1 of 2

RETURN OF SERVICE

E-0199330 172nd JUDICIAL DISTRICT COURT
DONNA KELLAMS
ROMEO TRUCKING LLC ET AL

Executed when copy was delivered:
This is a true copy of the original citation, was delivered to defendant _____, on the _____ day of _____, 20____.

_____, Officer
_____, County, Texas
By: _____, Deputy

ADDRESS FOR SERVICE:
BORDELON, ERIC
BY SERVING TRYON D LEWIS, TEXAS TRANSPORTATION COMMISSION

LAKE CHARLES, LA 70607 0000

OFFICER’S RETURN

Came to hand on the _____ day of _____, 20____, at _____, o’clock ____m., and executed in _____, County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the Citation at the following times and places, to-wit:

Name	Date/Time	Place, Course and Distance from Courthouse
_____	_____	_____

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being:

and the cause or failure to execute this process is:

and the information received as to the whereabouts of said defendant(s) being:

FEES:

Serving Petition and Copy \$ _____
Total \$ _____

_____, Officer
_____, County, Texas
By: _____, Deputy

Affiant

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer of authorized person who serves, or attempts to serve, a citation shall sign and return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty of perjury and contain the following statement:

“My name is _____, my date of birth is _____, and my address is _____.
(First, Middle, Last)

(Street, City, Zip)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Executed in _____, County, State of _____, on the _____ day of _____.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017
JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS
Jamie Smith

Declarant/Authorized Process Server

(Id # expiration of certification)



C0199330---00013

CITATION

THE STATE OF TEXAS

No. E-0199330

**DONNA KELLAMS
VS. ROMEO TRUCKING LLC ET AL**

CITATION

**172nd JUDICIAL DISTRICT COURT
of JEFFERSON COUNTY, TEXAS**

To: **ROMEO TRUCKING LLC
BY SERVING TRYON D LEWIS, TEXAS TRANSPORTATION COMMISSION
FORWARD TO ROMEO TRUCKING LLC**

by serving at:
1516 CLOVER DRIVE

LAKE CHARLES, LA 70607

DEFENDANT:

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Said answer may be filed by mailing same to: District Clerk's Office, 1085 Pearl, Room 203, Beaumont, TX 77701, (or if the case is designated as an E-file case, E-file through Lexis Nexis file and serve) or by bringing it to the office. The case is presently pending before the 172nd District Court of Jefferson County sitting in Beaumont, Texas, and was filed on the 3rd day of December, 2016. It bears cause number E-0199330 and is styled:

Plaintiff:

**DONNA KELLAMS
VS.
ROMEO TRUCKING LLC ET AL**

Defendant:

The name and address of the attorney for plaintiff (or plaintiff if pro se) is:

**LILES, WILLIAM R, Atty.
BANK OF AMERICA 12605 EAST FREEWAY, STE 400
HOUSTON, TX 77015 0**

The nature of the demands of said plaintiff is shown by a true and correct copy of Plaintiff's PETITION (PLAINTIFF'S ORIGINAL) AND LETTER DESIGNATING ALL CASES BE EFILED accompanying this citation and made a part thereof.

Issued under my hand and the seal of said court, at Beaumont, Texas, this the 5th day of December, 2016.

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Stacie C. Munelle

BY

Deputy

Stacie



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 1 of 2

RETURN OF SERVICE

E-0199330 172nd JUDICIAL DISTRICT COURT
DONNA KELLAMS
ROMEO TRUCKING LLC ET AL

Executed when copy was delivered:
This is a true copy of the original citation, was delivered to defendant _____, on the _____ day of _____, 20____.

_____, Officer
_____, County, Texas
By: _____, Deputy

ADDRESS FOR SERVICE:
ROMEO TRUCKING LLC
BY SERVING TRYON D LEWIS, TEXAS TRANSPORTATION COMMISSION

LAKE CHARLES, LA 70607 0000

OFFICER’S RETURN

Came to hand on the _____ day of _____, 20____, at _____, o’clock ____m., and executed in _____, County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the Citation at the following times and places, to-wit:

Name	Date/Time	Place, Course and Distance from Courthouse
_____	_____	_____

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being:

and the cause or failure to execute this process is:

and the information received as to the whereabouts of said defendant(s) being:

FEES:

Serving Petition and Copy \$ _____
Total \$ _____

_____, Officer
_____, County, Texas
By: _____, Deputy

Affiant

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer of authorized person who serves, or attempts to serve, a citation shall sign and return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty of perjury and contain the following statement:
“My name is _____, my date of birth is _____, and my address is _____
(First, Middle, Last)

(Street, City, Zip)
I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Executed in _____, County, State of _____, on the _____ day of _____.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office
January 23, 2017
JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS
Jamie Smith

Declarant/Authorized Process Server

(Id # expiration of certification)

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
JAMIE SMITH 199330-00012
DISTRICT CLERK
E-199330

CITATION

THE STATE OF TEXAS

No. E-0199330

**DONNA KELLAMS
VS. ROMEO TRUCKING LLC ET AL**

CITATION

**172nd JUDICIAL DISTRICT COURT
of JEFFERSON COUNTY, TEXAS**

To: **BORDELON, ERIC
BY SERVING TRYON D LEWIS, TEXAS TRANSPORTATION COMMISSION
FORWARD TO ERIC BORDERLON, ROMEO TRUCKING LLC**

by serving at:
3901 HARVARD STREET

LAKE CHARLES, LA 70607

DEFENDANT:

NOTICE

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Said answer may be filed by mailing same to: District Clerk's Office, 1085 Pearl, Room 203, Beaumont, TX 77701, (or if the case is designated as an E-file case, E-file through Lexis Nexis file and serve) or by bringing it to the office. The case is presently pending before the 172nd District Court of Jefferson County sitting in Beaumont, Texas, and was filed on the 3rd day of December, 2016. It bears cause number E-0199330 and is styled:

Plaintiff:

**DONNA KELLAMS
VS.
ROMEO TRUCKING LLC ET AL**

Defendant:

The name and address of the attorney for plaintiff (or plaintiff if pro se) is:

**LILES, WILLIAM R, Atty.
BANK OF AMERICA 12605 EAST FREEWAY, STE 400
HOUSTON, TX 77015 0**

The nature of the demands of said plaintiff is shown by a true and correct copy of Plaintiff's PETITION (PLAINTIFF'S ORIGINAL) AND LETTER DESIGNATING ALL CASES BE EFILED accompanying this citation and made a part thereof.

Issued under my hand and the seal of said court, at Beaumont, Texas, this the 5th day of December, 2016.

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Stacie C. Murrelle

BY

Deputy



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

RETURN OF SERVICE

E-0199330

172nd JUDICIAL DISTRICT COURT

DONNA KELLAMS

ROMEO TRUCKING LLC ET AL

Executed when copy was delivered:

This is a true copy of the original citation, was delivered to defendant _____, on the _____ day of _____, 20____.

_____, Officer
 _____, County, Texas
 By: _____, Deputy

ADDRESS FOR SERVICE:

BORDELON, ERIC

BY SERVING TRYON D LEWIS, TEXAS TRANSPORTATION COMMISSION

LAKE CHARLES, LA 70607 0000

OFFICER'S RETURN

Came to hand on the _____ day of _____, 20____, at _____, o'clock ____m., and executed in _____, County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the Citation at the following times and places, to-wit:

Name	Date/Time	Place, Course and Distance from Courthouse
_____	_____	_____

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being: _____

and the cause or failure to execute this process is: _____

and the information received as to the whereabouts of said defendant(s) being: _____

FEES:

Serving Petition and Copy \$ _____

Total \$ _____

_____, Officer
 _____, County, Texas

By: _____, Deputy

Affiant

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer of authorized person who serves, or attempts to serve, a citation shall sign and return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty of perjury and contain the following statement:

"My name is _____, my date of birth is _____, and my address is _____
 (First, Middle, Last)

(Street, City, Zip)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Executed in _____, County, State of _____, on the _____ day of _____.

Declarant/Authorized Process Server

(Id # expiration of certification)



I CERTIFY THIS IS A TRUE COPY
 Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
 JEFFERSON COUNTY, TEXAS

AFFIDAVIT OF SERVICE

Cause No. E-199330

In The District Court of Jefferson County, Texas
172nd Judicial District

DONNA KELLAMS
Plaintiff

VS.

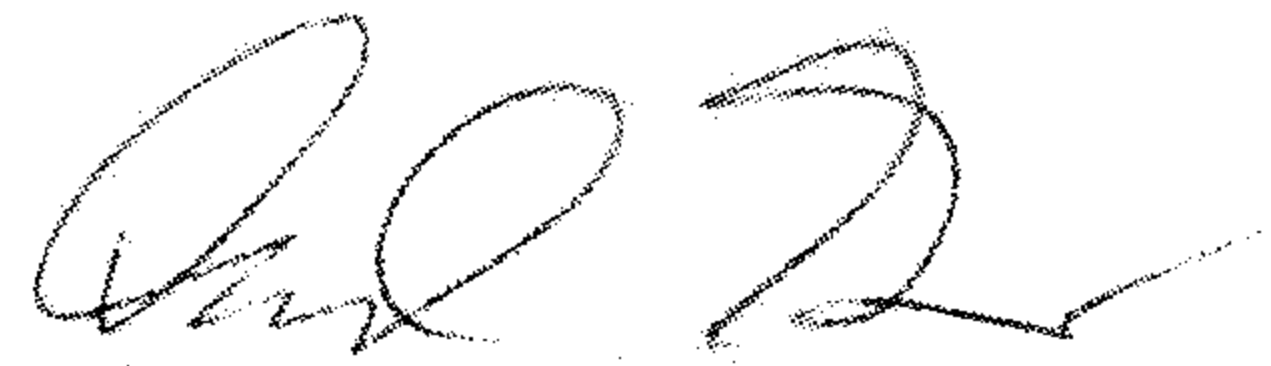
ROMEO TRUCKING LLC and
ERIC BORDELON
Defendants

I received this citation on December 13, 2016, at 8:00 a.m.

Executed via certified mail return receipt at Texas Transportation Commission, 125 East 11th Street, Austin, Texas 78701 within the County of Travis on December 13, 2016, by delivering to the within named:

ERIC BORDELON, by delivering certified mail return receipt, Article No. 7016 0600 0000 1360 7535 (see green card attached), a true copy of this Citation with Plaintiff's Original Petition, with the date of delivery endorsed thereon by me and informed said person of the contents therein, in compliance with state statutes.

I certify that I am approved by the Supreme Court of Texas, Misc. Docket No. 05-9122 under rule 103, 501 and 501.2 of the TRCP to deliver citations and other notices from any District, County, and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime involving moral turpitude, and I am not interested in the outcome of the above-referenced cause.

By: 
David A. Garza
Republic Services
4202 Sherwood, Houston, Texas 77092
713.957.0094
Texas Server LIC No. SCH-502
Exp. 7-31-2017

DAVID A GARZA
Authorized Private Process Server
TX SERVER LIC# SCH-502
Exp 7-31-2017



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

 Page 3 of 5

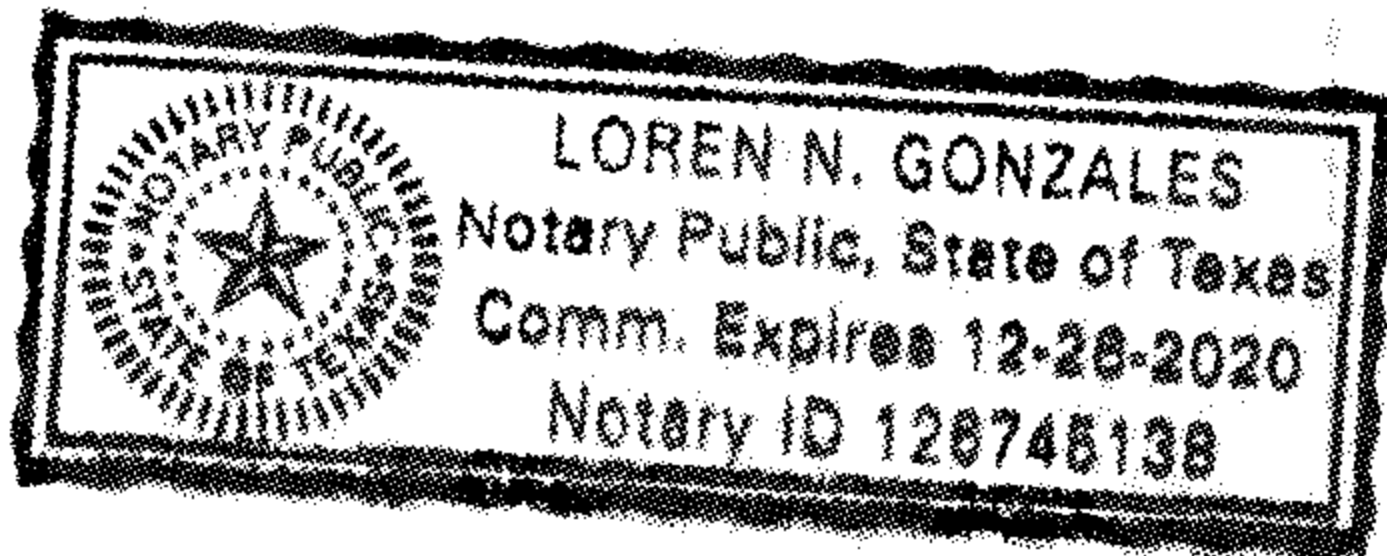
AFFIDAVIT OF SERVICE FOR CAUSE NO. E-199330

VERIFICATION

STATE OF TEXAS §
COUNTY OF HARRIS §

BEFORE ME, A NOTARY PUBLIC, on this day personally appeared **David A. Garza**, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct.

Given under my hand and seal of office on this 12/29/2016.




NOTARY PUBLIC, STATE OF TEXAS



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

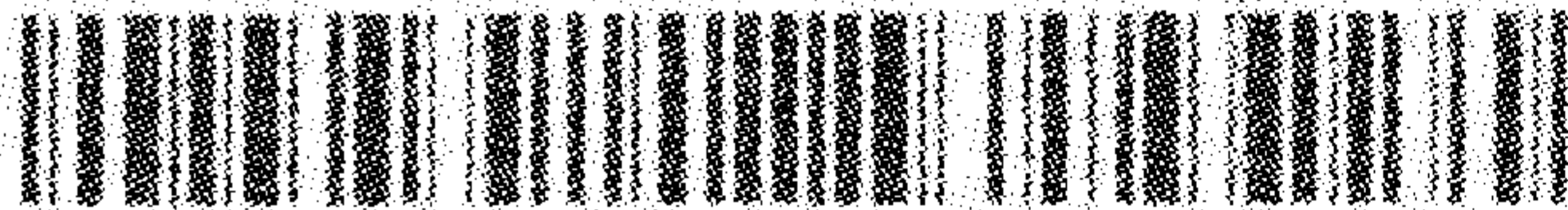
 Page 4 of 5

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Eric Bordeaux c/o
 Tyron D Lewis
 Texas Transportation Commission
 125 East 11th Street, 6th Floor
 Austin, TX 78701



9590 9402 1748 6074 2698 77

I CERTIFY THIS IS A TRUE COPY
 Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
 JEFFERSON COUNTY, TEXAS



2. Article Number

7016 0600 0000 1368 7535

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery made by someone other than the addressee?
 If YES, enter delivery address below.

☐ Yes☐ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery (over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
JAMIE SMITH E-199330-00013
DISTRICT CLERK
E-199330

CITATION

THE STATE OF TEXAS

No. E-0199330

DONNA KELLAMS
VS. ROMEO TRUCKING LLC ET AL

CITATION

172nd JUDICIAL DISTRICT COURT
of JEFFERSON COUNTY, TEXAS

To: ROMEO TRUCKING LLC
BY SERVING TRYON D LEWIS, TEXAS TRANSPORTATION COMMISSION
FORWARD TO ROMEO TRUCKING LLC

by serving at:
1516 CLOVER DRIVE

LAKE CHARLES, LA 70607

DEFENDANT:

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Said answer may be filed by mailing same to: District Clerk's Office, 1085 Pearl, Room 203, Beaumont, TX 77701, (or if the case is designated as an E-file case, E-file through Lexis Nexis file and serve) or by bringing it to the office. The case is presently pending before the 172nd District Court of Jefferson County sitting in Beaumont, Texas, and was filed on the 3rd day of December, 2016. It bears cause number E-0199330 and is styled:

VS. DONNA KELLAMS
ROMEO TRUCKING LLC ET AL

Plaintiff.

Defendant:

The name and address of the attorney for plaintiff (or plaintiff if pro se) is:

LILES, WILLIAM R, Atty.
BANK OF AMERICA 12605 EAST FREEWAY, STE 400
HOUSTON, TX 77015 0

The nature of the demands of said plaintiff is shown by a true and correct copy of Plaintiff's PETITION (PLAINTIFF'S ORIGINAL) AND LETTER DESIGNATING ALL CASES BE FILED accompanying this citation and made a part thereof.

Issued under my hand and the seal of said court, at Beaumont, Texas, this the 5th day of December, 2016.

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

BY

Deputy

Stacie



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith

RETURN OF SERVICE

E-0199330

172nd JUDICIAL DISTRICT COURT

DONNA KELLAMS

ROMEO TRUCKING LLC ET AL

Executed when copy was delivered:

This is a true copy of the original citation, was delivered to defendant _____, on the _____ day of _____, 20____.

_____, Officer
_____, County, Texas
By: _____, DeputyADDRESS FOR SERVICE

ROMEO TRUCKING LLC

BY SERVING TRYON D LEWIS, TEXAS TRANSPORTATION COMMISSION

LAKE CHARLES, LA 70607 0000

OFFICER'S RETURN

Came to hand on the _____ day of _____, 20____, at _____, o'clock _____.m., and executed in _____, County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the Citation at the following times and places, to-wit:

Name	Date/Time	Place, Course and Distance from Courthouse
_____	_____	_____

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being: _____

and the cause or failure to execute this process is: _____

and the information received as to the whereabouts of said defendant(s) being: _____

FEES:

Serving Petition and Copy \$ _____

Total \$ _____

_____, Officer
_____, County, Texas
By: _____, Deputy

Affiant

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer of authorized person who serves, or attempts to serve, a citation shall sign and return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty of perjury and contain the following statement:

"My name is _____, my date of birth is _____, and my address is _____
(First, Middle, Last)

(Street, City, Zip)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Executed in _____, County, State of _____, on the _____ day of _____.

Declarant/Authorized Process Server

(Id # expiration of certification)

I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS
Jamie Smith

AFFIDAVIT OF SERVICE

Cause No. E-199330

In The District Court of Jefferson County, Texas
172nd Judicial District

DONNA KELLAMS
Plaintiff

VS.

ROMEO TRUCKING LLC and
ERID BORDELON
Defendant

I received this citation on December 13, 2016, at 8:00 a.m.

Executed via certified mail return receipt at Texas Transportation Commission, 125 East 11th Street, Austin, Texas 78701 within the County of Travis on December 13, 2016, by delivering to the within named:

ROMEO TRUCKING LLC, by delivering certified mail return receipt, Article No. 7016 0600 0000 1360 4787 (see green card attached), a true copy of this Citation with Plaintiff's Original Petition, with the date of delivery endorsed thereon by me and informed said person of the contents therein, in compliance with state statutes.

I certify that I am approved by the Supreme Court of Texas, Misc. Docket No. 05-9122 under rule 103, 501 and 501.2 of the TRCP to deliver citations and other notices from any District, County, and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime involving moral turpitude, and I am not interested in the outcome of the above-referenced cause.

By: _____

David A. Garza
Republic Services
4202 Sherwood, Houston, Texas 77092
713.957.0094
Texas Server LIC No. SCH-502
Exp. 7-31-2017

DAVID A GARZA
Authorized Private Process Server
TX SERVER LIC# SCH-502
Exp 7-31-2017



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 3 of 5

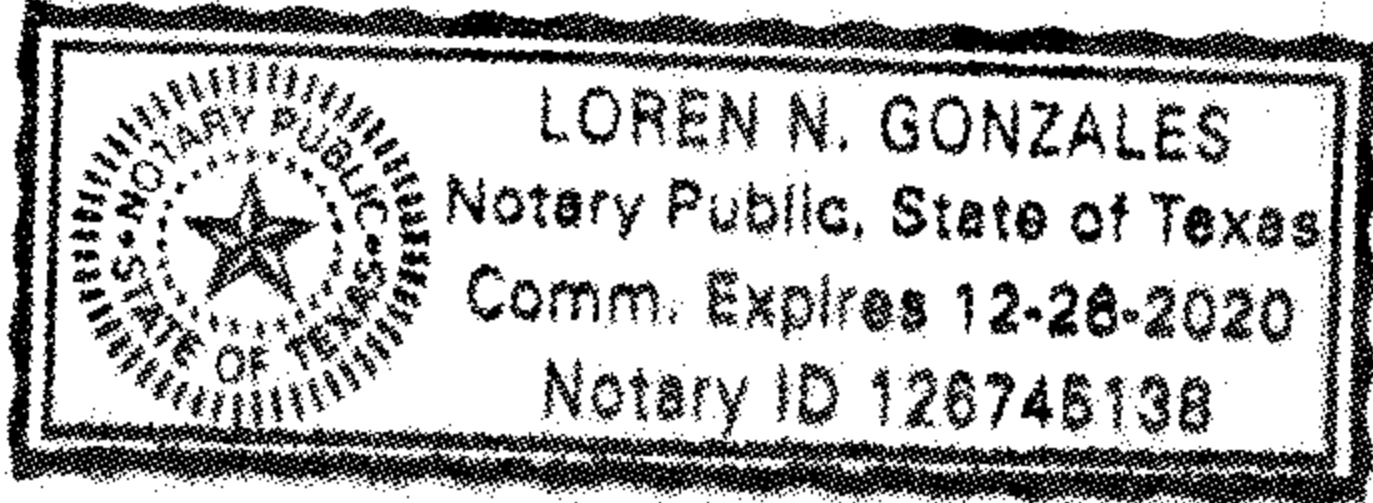
AFFIDAVIT OF SERVICE FOR CAUSE NO. E-199330

VERIFICATION

STATE OF TEXAS §
COUNTY OF HARRIS §

BEFORE ME, A NOTARY PUBLIC, on this day personally appeared **David A. Garza**, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct.

Given under my hand and seal of office on this 12/29/2016.




NOTARY PUBLIC, STATE OF TEXAS



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

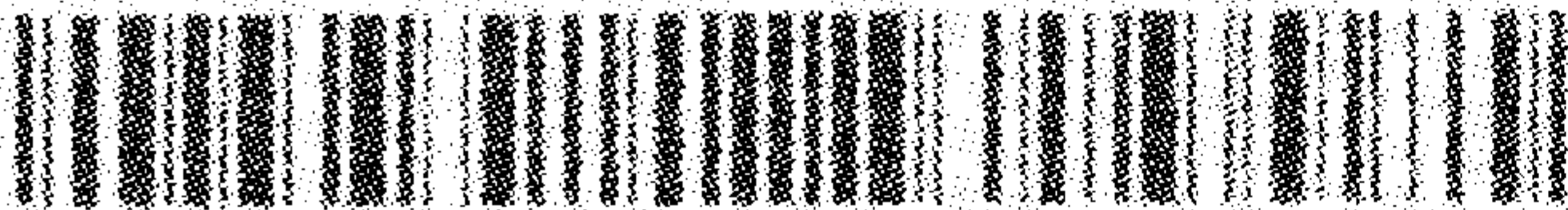
 Page 4 of 5

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Romeo Trucking LLC c/o
 TYRON D LEWIS
 Texas Transportation Commission
 125 East 11th Street, 1st Floor
 Austin, TX 78701



9590 9402 1748 6074 2698 84

I CERTIFY THIS IS A TRUE COPY
 Witness my Hand and Seal of Office

January 23, 2017

2. Article Number (Traceable Mail Only)

7016 0600 0000 1360 4287



JAMIE SMITH, DISTRICT CLERK
 JEFFERSON COUNTY, TEXAS

Page 5 of 6

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Print Name)

C. Date of Delivery

D. Is delivery address different from item A?
 If YES, enter delivery address below:

☐ Yes☐ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery
(over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted
Delivery☒ Return Receipt for
Merchandise☐ Signature Confirmation™☐ Signature Confirmation
Restricted Delivery

Cause No: E-0199330 Date: 12/29/16 Receipt No: 367435
Style: DONNA KELLAMS
vs ROMEO TRUCKING LLC ET AL

Paid By: LILES, WILLIAM R P
Amt Paid: Bal Due:

JAMIE SMITH, CLERK DISTRICT COURTS
Jefferson County, Texas

By: _____
ODBC Deputy



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

January 23, 2017

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith
Page 1 of 1

